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Attorneys for Defendant  
MARVELL SEMICONDUCTOR, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

FRANCE TELECOM S.A.,

Plaintiff,

vs.

MARVELL SEMICONDUCTOR, INC.,

Defendant.

Case No. 12-CV-04967 (WHO)

**DECLARATION OF KRISTA M.  
RYCROFT IN SUPPORT OF MARVELL  
SEMICONDUCTOR, INC.'S *DAUBERT*  
MOTION TO EXCLUDE OPINIONS AND  
TESTIMONY OF PROF. BRADFORD  
CORNELL**

I, Krista M. Rycroft, declare as follows:

1. I am an attorney licensed in good standing in the State of New York, and have been

1 admitted *pro hac vice* by the Court in this litigation. (D.I. 64).

2 2. I am an associate at Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”),  
3 and I represent Marvell Semiconductor, Inc. (“MSI”).

4 3. I submit this declaration in support of Marvell Semiconductor Inc.’s *Daubert* Motion to  
5 Exclude The Opinions and Testimony of Professor Bradford Cornell and Professor Michael  
6 Mitzenmacher, which is filed concurrently.

7 4. **Exhibit 1** is a true and correct copy of an email from Joseph J. LoBue to Eric Huang,  
8 dated August 10, 2014 at 11:22 a.m.

9 5. **Exhibit 2** is a true and correct copy of excerpts from the February 14, 2014 Report of  
10 Professor Bradford Cornell, including pages 1, 4, 8, 36-37, 53, and 57. This report was designated  
11 by France Telecom as “Highly Confidential-Attorneys’ Eyes Only” pursuant to the Amended  
12 Protective Order. (D.I. 126).

13 6. **Exhibit 3** is a true and correct copy of excerpts from the March 18, 2014 Deposition of  
14 Bradford Cornell, including pages 1-8, 23-35, 39-41, 59-60, 81, 83-84, 87-89, 91-92, 111, 123-  
15 124, 134, 147-148, 182-183, 211-213, 254-255, 264-265, 268, 295-297, and Errata sheet. This  
16 transcript is designated “Highly Confidential-Attorneys’ Eyes Only” pursuant to the Amended  
17 Protective Order. (D.I. 126).

18 7. **Exhibit 4** is a true and correct copy of excerpts from the January 22, 2014 30(b)(6) and  
19 personal Deposition of Erik Johnson, including pages 1-5, 148-149, 184, 248-249, and Errata  
20 sheet. This transcript is designated “Highly Confidential-Attorneys’ Eyes Only” pursuant to the  
21 Amended Protective Order. (D.I. 126).

22 8. **Exhibit 5** is a true and correct copy of a document entitled “3G Running Royalties”  
23 bearing Bates stamp FT045643. This document was marked as Defendant’s Deposition Exhibit  
24 (DDX) 37 at the January 22, 2014 30(b)(6) and personal Deposition of Erik Johnson. This  
25 document was designated by France Telecom as “Highly Confidential-Attorneys’ Eyes Only”  
26 pursuant to the Amended Protective Order. (D.I. 126).

27 9. **Exhibit 6** is a true and correct copy of excerpts of a July 24, 2007 letter from Erik  
28 Johnson to NEC Electronics Corporation bearing Bates stamp FT043650-FT043651.

1           10. **Exhibit 7** is a true and correct copy of a document entitled "Blackberry Limited,  
2 Specified HH Models Unit Sales, Period Jan 2006 to Aug 2012, USA Only" bearing Bates stamp  
3 BB\_00001. This document is designated "Highly Confidential-Attorneys' Eyes Only" pursuant to  
4 the Amended Protective Order. (D.I. 126).

5           11. **Exhibit 8** is a true and correct copy of the "Declaration of David Matukaitis In Support  
6 of Marvell Semiconductor, Inc.'s Motion for Partial Summary Judgment To Limit The Scope Of  
7 France Telecom's Asserted Damages Base," dated February 27, 2014. This document was also  
8 previously filed with the Court as D.I. 135-18 (unredacted version as D.I. 135-17). This document  
9 is designated "Highly Confidential-Attorneys' Eyes Only" pursuant to the Amended Protective  
10 Order (D.I. 126).

11           12. **Exhibit 9** is a true and correct copy of an email from Joseph J. LoBue to Eric Huang,  
12 dated August 11, 2014 at 11:11 a.m.

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14           I declare under the penalty of perjury under the laws of the United States of America that  
15 the foregoing is true and correct. Executed in New York, New York.

16  
17 August 12, 2014

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19 Krista M. Rycroft  
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